

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Debra Faye Pierce,

Court File No.: 22-cv-00441 (JWB/LIB)

Plaintiff,

vs.

**DECLARATION OF
ZORISLAV R. LEYDERMAN**

Itasca County, et al.,

Defendants.

I, Zorislav R. Leyderman, declare under penalty of perjury that the following is true and correct:

1. I am an attorney licensed to practice law in the State of Minnesota, and I represent Plaintiff Debra Pierce in this matter.
2. Attached hereto as **Exhibit 1** is a true and correct copy of Ms. Winslow's ambulance record for March 22, 2019.
3. Attached hereto as **Exhibit 2** is a true and correct copy of Ms. Winslow's GICH medical records.
4. Attached hereto as **Exhibit 3** is a true and correct copy of the Application for Probable Cause.
5. Attached hereto as **Exhibit 4** is a true and correct copy of Ms. Winslow's jail booking record.
6. Attached hereto as **Exhibit 5** is a true and correct copy of Ms. Winslow's jail activity log.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the Itasca County Jail incident reports.
8. Attached hereto as **Exhibit 7** is a true and correct copy of Ms. Winslow's Jail/ACH medical record.
9. Attached hereto as **Exhibit 8** is a true and correct copy of Ms. Winslow's ambulance record for March 23, 2019.
10. Attached hereto as **Exhibit 9** is a true and correct copy of Ms. Winslow's GICH discharge instructions (After Visit Summary) for the ER visit on March 23, 2019.
11. Attached hereto as **Exhibit 10** is a true and correct copy of Ms. Winslow's ambulance records for March 26, 2019.
12. Attached hereto as **Exhibit 11** is a true and correct copy of Ms. Winslow's medical records from St. Mary's Medical Center - Duluth.
13. Attached hereto as **Exhibit 12** is a true and correct copy of Ms. Winslow's Autopsy Report.
14. Attached hereto as **Exhibit 13** is a true and correct copy of the investigative report of A.J. Morse.
15. Attached hereto as **Exhibit 14** is a true and correct copy of Itasca County Jail Policy J-E-12 and J-E-13.
16. Attached hereto as **Exhibit 15** is a true and correct copy of Ms. Winslow's GICH ER medical records that were faxed to Itasca County Jail on March 26, 2019.

17. Attached hereto as **Exhibit 16** is a true and correct copy the job description for Defendant Captain Thompson (Jail Coordinator/Captain).
18. Attached hereto as **Exhibit 51** is a true and correct copy of the Expert Witness Affidavit and Report of Suzanne L. Ward, RN.
19. Attached hereto as **Exhibit 52** is a true and correct copy of the Supplemental Expert Witness Affidavit and Report of Suzanne L. Ward, RN. I served this report on all defense counsel on May 27, 2024.
20. Attached hereto as **Exhibit 53** is a true and correct copy of the Expert Witness Affidavit and Report of Barbara J. McGuire, MD.
21. Attached hereto as **Exhibit 54** is a true and correct copy of the Expert Witness Affidavit and Report of Jeffrey E. Keller, MD.
22. Attached hereto as **Exhibit 55** is a true and correct copy of the Expert Witness Affidavit and Report of Jill Ferry, PA-C.
23. Attached hereto as **Exhibit 56** is a true and correct copy of the Supplemental Expert Witness Affidavit and Report of Jill Ferry, PA-C. I served this report on all defense counsel on May 27, 2024.
24. Attached hereto as **Exhibit 100** is a true and correct copy of the Jail Surveillance Video.
25. Attached hereto as **Exhibit 101** is a true and correct copy of the Deposition Transcript of CO Amy Slettom.
26. Attached hereto as **Exhibit 102** is a true and correct copy of the Deposition Transcript of Nurse Jeniffer Pellersels, RN.

27. Attached hereto as **Exhibit 103** is a true and correct copy of the Deposition Transcript of Dianna Kachinske, NP.
28. Attached hereto as **Exhibit 104** is a true and correct copy of the Deposition Transcript of Captain Lucas Thompson.
29. Attached hereto as **Exhibit 105** is a true and correct copy of the Deposition Transcript of Sgt. Chad Latvala.
30. Attached hereto as **Exhibit 106** is a true and correct copy of the Deposition Transcript of Sgt. David Frechette.
31. Attached hereto as **Exhibit 107** is a true and correct copy of the Deposition Transcript of CO Marnie Olson.
32. Attached hereto as **Exhibit 108** is a true and correct copy of the Deposition Transcript of Sgt. Erin Nelson.

I, Zorislav R. Leyderman, declare under penalty of perjury that the foregoing is true and correct.

Executed on: 05/28/2024

s/ Zorislav R. Leyderman
Zorislav R. Leyderman, Declarant